

**UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA

VS.

TIMETHY MARRUGO

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§

Case No. 2:22-MJ-0186-BR

**MOTION FOR CONTINUANCE OF PRELIMINARY EXAMINATION
AND DETENTION HEARINGS**

Defendant Timethy Marrugo (“Marrugo”) by and through counsel, files this Motion to Continue the Preliminary Examination and Detention Hearings in the above-entitled and numbered cause and in support thereof, respectfully shows the Court as follows:

I.

A complaint was filed in this case on October 4, 2022, charging Marrugo with Distribution and Possession with Intent to Distribute Methamphetamine. Marrugo had his Initial Appearance on October 6, 2022. The Office of the Federal Public Defender was appointed to represent Marrugo on October 6, 2022. Marrugo’s Preliminary Examination and Detention Hearings are currently set for October 19, 2022 at 9:30 a.m.

II.

Counsel will be in trial the week of October 17, 2022 and will need additional time to meet with Marrugo to adequately prepare for said hearings. This request is made for good cause. Failure to grant a continuance in this case would unduly prejudice Marrugo by depriving him of his right to be effectively represented by counsel. Additionally, counsel has conferred with AUSA Anna Marie Bell, and she does not oppose Marrugo’s Motion for Continuance.

For these reasons, Marrugo respectfully requests that the Court continue the Preliminary Examination and Detention Hearings in this case until Thursday, October 27, 2022, or a date

convenient for the Court.

Respectfully Submitted,

JASON D. HAWKINS
Federal Public Defender
Northern District of Texas

/s/ Eric Coats
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**ATTORNEY FOR DEFENDANT
ALEX HALISSI BELL**

CERTIFICATE OF CONFERENCE

I certify that I conferred with AUSA Anna Marie Bell and confirmed that the government is not opposed to this request.

/s/ Eric Coats
ERIC COATS

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2022, I electronically filed the foregoing document using the Court's CM/ECF system, thereby providing service on attorneys of record.

/s/ Eric Coats
ERIC COATS